

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

ADAM FERRARI,

Plaintiff,

v.

WILLIAM FRANCIS,

Defendant.

§  
§  
§  
§  
§  
§  
§  
§

Case No. 3:23-cv-00455-S

**[PROPOSED] PROTECTIVE ORDER REGARDING DEFENDANT'S  
SUBPOENA TO FIRST INTERNATIONAL BANK & TRUST**

Having reviewed and considered Plaintiff's Motion for Protective Order Regarding Defendant's Subpoena to First International Bank & Trust (the "Motion"), and the briefing, evidence, and argument submitted in support of and in opposition to the Motion, and the applicable law, the Court hereby **GRANTS** the Motion and **ORDERS** as follows:

- First International Bank & Trust ("FIBT") shall not produce to Defendant any documents in response to Request Nos. 1-8 in Defendant's subpoena to FIBT dated April 1, 2024 (the "Subpoena").
- If FIBT identifies any documents responsive to Request Nos. 9, 10, or 11 in the Subpoena (the "Responsive Documents"), FIBT shall either (a) redact from the Responsive Documents all references to (i) financial or tax data for Mr. Ferrari, Mr. Ferrari's family members, Phoenix Capital Group Holding, LLC's ("Phoenix"), or any of Phoenix's members or employees, (ii) any names of, or financial or tax data for, any of Phoenix's investors, clients, lenders, or customers, or (iii) details of any of Phoenix's business plans, prior to producing such documents to Defendant's counsel; or (b) provide copies of the Responsive Documents to counsel for Mr. Ferrari to make such redactions.

- Any Responsive Documents produced by FIBT to Defendant's counsel will be treated as "Confidential Attorney Eyes Only" under the Agreed Protective Order (Dkt. 54) for a period of twenty-one (21) days, during which period Mr. Ferrari will notify Defendant in writing which, if any, of the produced documents are to be designated as either "Confidential Information" or "Confidential Attorney Eyes Only."

**IT IS SO ORDERED.**

Dated: \_\_\_\_\_, 2022

---

HONORABLE KAREN GREN SCHOLER  
UNITED STATES DISTRICT JUDGE